

United States Bankruptcy Court
District of Massachusetts

In re	<u>Romulo A. Rodrigues-Aguiar (XXX-XX-7172)</u> Chapter 7 Debtor in Adversary Proceedings	Adversary Proceeding Case No.	<u>16-01022MSH</u>
	JOHN O. DESMOND, TRUSTEE FOR THE CHAPTER 7 DEBTOR, ROMULO A. RODRIGUES-AGUIAR Plaintiff	Related Chapter 7 Case No.	<u>15-12640MSH</u>
	vs.		
	ROMULO A. RODRIGUES-AGUIAR Defendant		

***ASSENTED TO EXPEDITED* MOTION TO FURTHER ENLARGE
TIME WITHIN WHICH TO RESPOND TO PLAINTIFF'S COMPLAINT**

1. I am the undersigned James Hayes, debtor's counsel in the voluntary chapter seven case no 15-12640.
2. On or about February 20, 2016 I learned that this Honorable Court entered an appearance for me as debtor's counsel in adversary proceeding number 16-01022.
3. At present, the deadline for debtor's counsel to respond to the adversary complaint is April 4, 2016.
4. Undersigned counsel is working diligently; however, he is struggling to simultaneously respond to three other adversary complaints. Those are his first, second and fourth ever and the technical complexity is overwhelming.
6. This Court previously allowed an assented to motion for twenty one day enlargement of time within which to respond to Plaintiff's Complaint A further eight days (thru April 12, 2016 are needed to faithfully and effectively respond to Plaintiff's complaint.
7. Counsel for the Plaintiff ASSENTS to this motion.

WHEREFORE, pursuant to rule 9006 and other authority the undersigned James Hayes requests an enlargement of time until April 12, 2016 within which to respond on debtor's behalf to the adversary complaint in adversary case no. 16-01022. In addition and in the alternative undersigned counsel requests this Honorable Court to dispense such alternative or additional relief as it deems meet and just.

Date April 3, 2016

Signature /s/ James Hayes
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ASSENT

Plaintiff John O. Desmond, Trustee For The Chapter 7 Debtor, Romulo A. Rodrigues-Aguiar through counsel Jeffrey D. GANZ, Esquire hereby assents to this EXPEDITED Motion to Enlarge until April 12, 2016 Time to Respond to Adversary Complaint 16-01022.

/s/ Jeffrey D. Ganz, Esq.

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04/03/2016
Date